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June 19, 2020

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6/19/2020

Hon. Lewis J. Liman  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 701  
New York, NY 10007

SO ORDERED.

LEWIS J. LIMAN  
United States District Judge

**FILED BY ECF**

*Re: Advanced Water Technologies, Inc. v. Amiad U.S.A., Inc.*, No. 1:18-cv-05473-LJL

Dear Judge Liman:

This firm represents Amiad U.S.A., Inc. ("Amiad") in the above-referenced action. On June 15, 2020, this Court ordered Amiad to submit a draft interrogatory to the Court for it to review and approve. The interrogatory addresses the search terms AWT applied to collect documents in response to Amiad's document requests.

Attached as Exhibit 1 is a draft of Amiad's Second Set of Interrogatories Pursuant to the Court's June 15, 2020 Order and Fed. R. Civ. P. 33. We will await the Court's approval before we serve this interrogatory on Defendant.

Thank you for your attention to this matter.

Respectfully submitted,

/s/ Noah M. Weissman  
Noah M. Weissman

cc: Ronald Francis, counsel for Plaintiff, via ECF

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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ADVANCED WATER TECHNOLOGIES INC.,	:	Case No. 1:18-cv-05473-LJL
	:	
Plaintiff,	:	<b>AMIAD’S [DRAFT] SECOND SET</b>
	:	<b>OF INTERROGATORIES TO</b>
-against-	:	<b>PLAINTIFF PURSUANT TO</b>
	:	<b>THE COURT’S JUNE 15, 2020</b>
AMIAD U.S.A., INC.,	:	<b><u>ORDER AND FED. R. CIV. P. 33</u></b>
	:	
Defendant.	:	
	:	
-----X		

Defendant Amiad U.S.A., Inc. (“Amiad”), requests, pursuant to Fed. R. Civ. P. 33 and the Court’s June 15, 2020 order, that Plaintiff Advanced Water Technologies, Inc. (“Plaintiff” or “AWT”) answer the following interrogatories, under oath, and serve objections (if any) within 30 days of service.

**DEFINITIONS**

1. The definitions set forth in Rule 26.3 of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York (“Local Rules”) are incorporated herein by reference.

**INSTRUCTIONS**

1. In answering these interrogatories, Plaintiff is requested to set forth each interrogatory in full before setting forth a response.

2. Plaintiff must answer each interrogatory separately and completely in writing and under oath, unless it is objected to. If an interrogatory is objected to, Plaintiff must provide an explanation of the basis for the objection, and answer to the extent the interrogatory is not objectionable.

3. The instructions set forth in Fed. R. Civ. P. 26(b)(5) and Local Rule 26.2 and 26.3 are incorporated herein by reference.

4. If any response to these interrogatories, although correct when made, becomes no longer true, or circumstances are such that a failure to amend the response is in substance a knowing concealment, Plaintiff must amend the applicable response within a reasonable time.

5. These interrogatories are continuing in character so as to require Plaintiff, pursuant to Fed. R. Civ. P. 26(e), to promptly supplement their responses should any other information responsive hereto come into their possession, custody, or control prior to trial.

### **INTERROGATORIES**

5. State whether Plaintiff, including Matthias Kriesberg, used search terms or filters to search Plaintiff's electronic stored information ("ESI") or other data in Plaintiff's possession, custody, or control to identify ESI responsive to Amiad's document requests served on February 27, 2020? If so, identify each source of ESI searched, including email accounts, computer hard drives, or other storage media, and identify the search terms and filters applied during the search of ESI.

Dated: New York, New York  
June 19, 2020

### **BRYAN CAVE LEIGHTON PAISNER LLP**

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